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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THE CHILDREN'S PLACE, INC.,

Plaintiff,

vs.

**GREAT AMERICAN INSURANCE
COMPANY,**

Defendant.

Case No.: 2:18-CV-11963-ES-JAD

**[PROPOSED] ORDER GRANTING
THE CHILDREN'S PLACE, INC.'S
MOTION FOR SUMMARY
JUDGMENT**

This matter, having been brought before the Court on the application of Hunton Andrews Kurth LLP, attorneys for Plaintiff, The Children's Place, Inc. ("TCP"), on notice to Defendant, Great American Insurance Company ("GAIC"), for the entry of an Order Granting TCP's Motion for Summary Judgment; and the Court having considered the Memorandum in Support of TCP's Motion, the Local Rule 56.1 Statement, and all exhibits, filed in support of TCP's application;

IT IS on this ____ day of _____, 2020, **ORDERED** as follows:

- (1) It is hereby declared and adjudged that TCP's loss is covered under the Computer Fraud provision;
- (2) It is hereby declared and adjudged that TCP's loss is covered the Forgery or Alteration provision;
- (3) It is hereby declared and adjudged that GAIC has breached the insurance contract;
- (4) It is hereby declared and adjudged that TCP is entitled to damages in the amount of \$909,914.29, plus interest, and attorneys' fees; and
- (5) It is hereby declared and adjudged that a copy of this Order shall be served upon all counsel within ____ days of the date of receipt hereof.

The Honorable Esther Salas